

97-210

September 9, 1997



SEP 12 1997

Mr. Lester Snow
Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Lester:

I was able to attend the BDAC meeting held in Berkeley on September 4 and, at your general request, I am making some written comments regarding matters discussed at that meeting and a few others. My comments are not listed in any order of importance.

1. Alternatives 2d and 2e continue to include Bouldin Island as a floodway. The hydraulic gradient around Bouldin Island is so flat that including Bouldin Island as a part of a floodway will add little to flood protection. Also, the cost of dealing with Highway 12, which crosses the island, would be significant and the fishery benefits achieved by inundating Bouldin Island would be minimal because the island surface is so low. Additionally, because greater sandhill cranes and Swainson's hawks use Bouldin Island and Bouldin Island is a known foraging area for wintering waterfowl, a great deal of mitigation would be required to replace the deeply inundated island. It would be more efficient from a flood control standpoint to use lands east of the Mokelumne River up off Hog Slough and Beaver Slough. These are in your plans and appear to be sound because they are shallower and farther upstream and, therefore, will have greater flood control benefits.
2. Groundwater storage in both the Sacramento and San Joaquin Valleys should be common to all alternatives.
3. If an isolated facility is being considered, the use of that facility to supply fish-screened fresh water along its route as well as to the City of Stockton should be considered in the final design. This water supply will have both fishery and water quality benefits.
4. The yields of alternatives 2b and 3b are indicated to be identical although alternative 3b includes the addition of in-Delta storage as well as a 5,000 cfs peripheral canal. I understand why, under the present rules, an isolated facility does not seem to yield additional water, but the addition of an in-Delta storage facility certainly should increase project yield.

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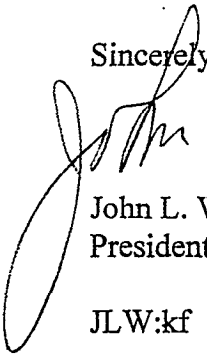
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5. I think that it would be appropriate to revisit the concept of a hydraulic barrier in Georgiana Slough. The barrier can be installed incrementally and is reversible if necessary. That is to say, it can be taken out of service without extraordinary capital cost losses due to abandonment. The concept provides an opportunity to increase cross-Delta flows of water and reduce the cross-Delta transport of fish.
6. In-Delta storage components should be added to alternatives 1 and 2.
7. We have done some preliminary investigations to evaluate the water quality impacts of the base case which is being used for the CALFED alternative studies. In our view the base case will create in-Delta salinities far beyond those which are acceptable to Delta water users, particularly water users who are subjected to disinfectant byproduct regulations. Although the pumping rates and timing used in the analysis of the base case are allowable under the *1995 Water Quality Control Plan*, it is unlikely that after further investigation the water-using public will be satisfied that those assumptions are truly realistic. In our view it would be a mistake to offer a straw-horse base case prejudicing the incremental effects of project alternatives.

Sincerely,



John L. Winther
President

JLW:kf